

# EXHIBIT B

RANDALL S. LUSKEY (SBN: 240915)  
rluskey@paulweiss.com  
**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**  
535 Mission Street, 24th Floor  
San Francisco, CA 94105  
Telephone: (628) 432-5100  
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)  
ratkins@paulweiss.com  
CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)  
cgrusauskas@paulweiss.com  
ANDREA M. KELLER (*Pro Hac Vice* admitted)  
akeller@paulweiss.com  
**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**  
1285 Avenue of the Americas  
New York, NY 10019  
Telephone: (212) 373-3000  
Facsimile: (212) 757-3990

*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC.;  
RASIER, LLC; and RASIER-CA, LLC

*[Additional Counsel Listed on Signature Page]*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF JENNIFER  
HANDLEY IN SUPPORT OF  
DEFENDANTS' OBJECTIONS (SECOND  
SET) TO SPECIAL MASTER PRIVILEGE  
DETERMINATIONS FOR CUSTODIANS  
SULLIVAN, FULDNER, AND CINELLI**

This Document Relates to:  
  
ALL ACTIONS

**DECLARATION OF JENNIFER HANDLEY**

I, Jennifer Handley, having personal knowledge of the following state:

1. I am the Senior Legal Director, Global Safety, at Uber. I was first employed by Uber in December 2018 and have worked as in-house counsel for the past 6 years. My previous roles include Senior Counsel, Safety and Legal Director, Safety. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Objections (Second Set) to Special Master Privilege Determinations for Custodians Sullivan, Fuldner, and Cinelli – Pursuant to Special Master Order No. 2 (Dkt. 2357) § III(8). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. I have reviewed the document identified in the privilege log as JCCP\_MDL\_PRIVLOG016142. It is a draft version of Uber's U.S. Safety Report marked "DRAFT V2" with "A\_C PRIV" in the file name. I sent this draft version on November 26, 2019 to Uber Senior Executive Team member, Gus Fuldner (then-Vice President, Safety and Insurance), and to in-house counsel, Katie Waitzman (then-Associate General Counsel, Safety and Insurance) and Scott Binnings (then-Legal Director, Safety).

3. I sent these individuals this draft for the purpose of seeking the legal advice of Ms. Waitzman and Mr. Binnings so that their advice could be considered and included as the draft report was being finalized. As I have explained in my previous declaration, a team of Uber's in-house attorneys, including myself, directed and coordinated the drafting of the Safety Report due to the legal risks of public statements regarding safety issues. The document identified as JCCP\_MDL\_PRIVLOG016142 is one iteration of the draft report; however, throughout the course of

1 drafting the report, I and other in-house attorneys exchanged, reviewed, and sought legal advice on  
2 this and other versions of the Safety Report during this timeline to manage future legal risks of public  
3 statements regarding safety issues. Uber's in-house attorneys provided legal advice on the draft report  
4 at every step of the way. The draft was maintained confidentially throughout the drafting process. I  
5 and the Uber in-house team sought to protect the confidentiality of the drafting process by carefully  
6 managing access to report drafts and utilizing additional measures such as watermarks and password  
7 protecting draft versions of the report, as is the case with this document. When non-attorneys, like Mr.  
8 Fuldner, were involved in the drafting process, they did so at the direction, and under the supervision,  
9 of counsel.  
10

11 I declare under penalty of perjury that the foregoing is true and correct. I declare under penalty  
12 of perjury that the foregoing is true and correct.  
13

14 Executed in Denver, Colorado on March 24, 2025.

By: Jennifer Handley  
Jennifer Handley